

**Verizon New England Inc.
d/b/a Verizon Massachusetts**

Commonwealth of Massachusetts

D.T.E. 01-39

Respondent: Bruce Lear
Title: Senior Specialist

REQUEST: AT&T Communications of New England & Covad
Communications, Inc., Set #2

DATED: December 5, 2001

ITEM: ATT/Covad 2-1 Please describe the educational background of Verizon witness
Bruce Lear.

REPLY: Mr. Lear attended a year of college at Old Dominion University
before pursuing his career with the Telephone Company.

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D.T.E. 01-39

Respondent: Bruce Lear

Title: Senior Specialist

REQUEST:

AT&T Communications of New England & Covad
Communications, Inc., Set #2

DATED:

December 5, 2001

ITEM: ATT/Covad 2-2

Please describe any and all training received by Mr. Lear, in addition to his educational background identified in response to information request # 1 above.

REPLY:

Mr. Lear has attended numerous internal and external training programs during his career at C&P Telephone/Bell Atlantic/Verizon. These include but are not limited to:

Electrical Fundamentals
Circuit Reading
Relay Apparatus
5 Crossbar Central Office Equipment and Maintenance
101 ESS
1 ESS
Transmission Fundamentals
Crossbar ATA System
Power Training (Course 1040)
Management Leadership
Special Service Center Operation Management
Operational Support Systems Fundamentals
TIRKS System
Facility and Equipment Planning (FEPS)
TCAS (T Carrier Alarm System)
Interoffice Provisioning Service Center Management
Fujitsu Fiber Multiplexer
Project Management

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Respondent: Bruce Lear
Title: Senior Specialist

REQUEST: AT&T Communications of New England & Covad
Communications, Inc., Set #2

DATED: December 5, 2001

ITEM: ATT/Covad 2-3 Please describe each professional position that Mr. Lear has held in his 33 years of telecommunications experience, as stated in Mr. Lear's testimony in this case. Include in each such description Mr. Lear's employer, job title, dates the position was held, and responsibilities.

REPLY: Mr. Lear has held the following positions during his 33 years with C&P Telephone/Bell Atlantic/Verizon:

Frame Technician (1968-1972) Responsible for installation of service orders at the central office frame (U.S. Army 1969-1971).

Central Office Technician (1972-1983) Responsible for maintenance of central office telecommunications equipment and facilities (# 5 crossbar, 101 ESS and 1A ESS)

Supervisor Central Office Cut-over team (1982-1983)
Conversion of x-bar offices to electronic switches and new distribution frames.

Central Office Supervisor (1983)
Managed installation and Maintenance of Special Services and Interoffice facilities.

Supervisor Special Services Center (1983-1984)
Managed trouble reporting, analysis and input to Operational Support Systems.

REPLY: ATT/Covad 2-3
(cont'd)

**Supervisor Facilities Maintenance and Administrations
Center (FMAC) (1984-1986)**

Implemented Operational Support System to monitor the digital and interoffice network and managed 24 hour maintenance of the digital network.

Supervisor Circuit Provisioning Center (CPC) (1986-1990)

Managed the design and rearrangements of special services circuits and trunks and Field Assistance teams.

Service Manager (1990-1996)

Customer advocate for large business customer and Competitive Access Providers.

Senior Specialist Product Line Manager Collocation (1996-present)

Responsible for developing, managing and implementing collocation procedures and tariffs for the Verizon east jurisdictions.

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Respondent: Bruce Lear
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REQUEST: AT&T Communications of New England & Covad
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DATED: December 5, 2001

ITEM: ATT/Covad 2-5 Please describe Mr. Lear's education, training and professional experience specifically relevant to the configuration and sizing of power plants and power delivery systems to telecommunication equipment located in Verizon wire centers. Describe if, and to what extent, he currently has or ever had responsibilities for or involvement in the engineering or provisioning of power in Verizon wire centers, including determinations with respect to expansion of power resources.

REPLY: None.

**Verizon New England Inc.
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D.T.E. 01-39

Respondent: Lynelle Reney
Title: Director

REQUEST: AT&T Communications of New England & Covad
Communications, Inc., Set #2

DATED: December 5, 2001

ITEM: ATT/Covad 2-6 Please describe additional post-secondary school educational background of Verizon witness Lynelle Reney, if any, in addition to her Bachelor's degree in Psychology and Masters Degree in Business Administration from the University of Rhode Island, as stated in her testimony in this case.

REPLY: Ms. Reney holds a Master's Certificate in Project Management from the George Washington University School of Business and Public Management.

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D.T.E. 01-39

Respondent: Lynelle Reney
Title: Director

REQUEST: AT&T Communications of New England & Covad
Communications, Inc., Set #2

DATED: December 5, 2001

ITEM: ATT/Covad 2-7 Please describe any and all training received by Ms. Reney, in
addition to her educational background identified in response to
information request # 5 above and in her direct testimony.

REPLY: Ms. Reney has attended numerous internal and external training
programs during her tenure at NYNEX/New England
Telephone/Bell Atlantic/Verizon. These include but are not
limited to:

Leadership Development Program (University of MD)
TIRKS System F1 Carrier Module (Bellcore)
Developing Managerial Excellence (University of VA)
Leadership Challenge Development Program (University of PA)
Functional Accounting System Codes (Internal)
Mutual Gains Bargaining (Cornell University)
Excellence in Action (Internal)
Customer Oriented Selling II (Tratec)
Contract Law Seminar (Internal)
Winning Negotiations (Bryant College)
Professional Selling Skill III (Xerox)
Negotiation Skills for Real Estate Development (MIT)
Alpha Training (Internal)

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Respondent: Lynelle Reney
Title: Director

REQUEST: AT&T Communications of New England & Covad
Communications, Inc., Set #2

DATED: December 5, 2001

ITEM: ATT/Covad 2-8 Please describe each professional position that Ms. Reney has held in her 17 years of telecommunications experience, as stated in Ms. Reney's testimony in this case. Include in each such description Ms. Reney's employer, job title, dates the position was held, and responsibilities.

REPLY: Ms. Reney has held the following positions during her 17 years with NYNEX/New England Telephone/Bell Atlantic/Verizon:

Senior Specialist/TIS Collocation Project Management (4/97 to 4/00)

Project managed all tasks necessary to construct and turn up collocation arrangements across the BA footprint. Act as single point of contact for assigned customer base on all collocation related issues. Work closely with Regulatory, Product Management, Engineering and Operations in the development and deployment of collocation products and services.

Staff Director - Plug In Management (3/96 – 4/97)

Responsible to identify opportunities and develop and implement procedures to improve customer service and asset management for the PICS organization. Primary focus was on NCTE, inventory management, forecasting and repair process.

REPLY: ATT/Covad 2-8
(cont'd)

Staff Director - Capital Utilization Project (6/95-3/96)

Analyzed cost components of the capital budget by comparing internal processes in New York and New England and identifying ways to improve capital efficiencies. Technologies studied included Litespan, SONET, Power and Switch.

Area Operations Manager – Equipment Installation (12/93-6/95)

Directed the recovery of central office assets. Developed methods and procedures to identify and recover interoffice facility cable and associated equipment. Responsible to oversee the installation of central office equipment.

Staff Director - Motor Vehicles (9/93-12/93)

Managed all staff functions necessary to support a 7000 vehicle fleet including procurement, accounts payable, database, technical support and customer service center.

Staff Director - Corporate Services (1/93 - 9/93)

Implemented the transition to an outside vendor for the property management of 120 garage facilities throughout New England. Developed budget and monitored vendor expenditures and performance. Administered leases and rental payments.

Area Operations Manager - Real Estate Management (7/91-1/93)

Managed 6 field managers and 29 support personnel responsible for the day-to-day operation, maintenance and repair improvement of New England Telephone facilities in N/NE Massachusetts.

Real Estate Manager (3/88-7/91)

Negotiated land purchases, lease documents and coordinated bidding of projects. Served as liaison between NYNEX tenants and landlords on lease negotiations. Worked closely with attorneys in developing and negotiating legal documents.

Account Executive (12/85-3/88)

Sold diverse product lines to New England Telephone and NYNEX Corporate. Developed and implemented account plans.

REPLY: ATT/Covad 2-8
(cont'd)

Assistant Purchasing Manager (7/85-12/85)

Managed a staff of data entry clerks. Delegated work loads, resolved errors and performed quality checks on outgoing purchase orders.

Assistant Manager - Catalog and Approved Products (4/84-7/85)

Coordinated publication of catalogs for NYNEX distribution. Collected data, proofed item listings, scheduled production and coordinated departmental input. Streamlined database and revamped catalog format.

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Respondent: Lynelle Reney
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ITEM: ATT/Covad 2-9 Please identify each and every proceeding in which Ms. Reney has testified, in addition to Docket No. P-00001852 of the Pennsylvania Public Utility Commission, as identified in her testimony in this case. Provide copies of her testimony in Pennsylvania P.U.C. Docket No. P-00001852. For any other proceeding identified in response to this information request, identify the topics on which Ms. Reney provided testimony; and in the event that Ms. Reney provided testimony in any other proceeding on collocation power and other issues raised by AT&T in this proceeding, provide copies of such written testimony.

REPLY: Ms. Reney has only participated in the above referenced proceeding.

See attached.

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Respondent: Lynelle Reney
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ITEM: ATT/Covad 2-10 Please describe Ms. Reney's education, training and professional experience specifically relevant to the configuration and sizing of power plants and power delivery systems to telecommunication equipment located in Verizon wire centers. Describe if, and to what extent, she has responsibilities for or involvement in the engineering or provisioning of power in Verizon wire centers, including determinations with respect to expansion of power resources.

REPLY: None.

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Respondent: Bruce Lear
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ITEM: ATT/Covad 2-11 Identify (by name, position, business address, responsibilities and length of tenure in the position) the principal Verizon staff person or persons who currently determine or have determined during the last five years the sizing of power plants to meet the equipment requirements of Verizon and CLECs for each collocation site in Massachusetts.

REPLY: Verizon MA objects to this requests on grounds that is unduly burdensome to the extent it requires the identification of a “principal Verizon staff person” who currently determines or has determined during the last five years the sizing of power plants to meet the equipment requirements of Verizon and CLECs for each collocation site in Massachusetts.

Subject to the foregoing objection and without waiving it Verizon states that Power planners are one element to the determining the sizing of power plants. Input is required from a multitude of sources such IOF, Switch, and OSP planners to determine forecasts. Common Systems engineers that allocate space and Network Power Maintenance personnel may also have an impact on a plant size.

In addition to power planners, standards committees and Corporate Sourcing set the standards and administer contracts for Verizon’s power equipment venders.

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ITEM: ATT/Covad 2-12 Identify (by name, position, business address, responsibilities and length of tenure in the position) the principal Verizon staff person or persons during the last five years who is/are responsible for configuring the systems that provide power to CLECs for each collocation site in Massachusetts.

REPLY: Verizon MA objects to this requests on grounds that is unduly burdensome to the extent it requires the identification of a “principal Verizon staff person or persons” during the last five years who is/are responsible for configuring the systems that provide power to CLECs for each collocation site in Massachusetts.

Subject to the foregoing objection and without waiving it Verizon states that Verizon initially engineered much of the Collocation work in house using standards set by many groups.

Verizon MA now receives the request through the LCC organization. The Verizon Engineering Center then takes the request and contracts with a vendor engineering firm to detail the job. Determining the engineers for each site in Massachusetts, both within and outside Verizon, that have detailed engineered Collocation jobs would be impossible.